

QUESTIONS AND ANSWERS

Verification

1. Q: Is the LEA required to notify ADE in writing what verification sampling method they qualify for prior to selecting applications for verification?

A: No. The verification sampling method used will be reported on the verification report submitted through ADE's common logon. The verification sampling method used will also be evaluated during an administrative review.

2. Q: An LEA using the Standard Sampling Method does not have enough "error-prone" applications to meet the minimum required sample size. How does the LEA select additional applications?

A: The LEA must randomly select additional applications from all remaining applications (including FS, CA, FDPIR case number applications) to fulfill the minimum sample size requirement.

3. Q: Can the determining official also be the confirming official?

A: No. The review must be completed by an individual other than the individual who made the initial eligibility determination.

4. Q: Can I utilize Direct Verification Case Number Search for any case number application received during the school year?

A: No. Case Number Search is only an option for those Food Stamp and Cash Assistance case number applications selected for verification.

5. Q: What kind of written evidence is required for verification of a foster child's application?

A: School officials should contact the household in which the foster child resides and ask for the name, agency and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child and the amount of money designated by the agency for the child's personal use would be sufficient verification. The school official should, however, document the phone conversation with the social worker (identifying the social worker, agency and phone number, the status of the child and the child's personal use income). Another approach would be to ask the foster family for a copy of a written communication between the foster family and the placement agency in which the status of the child and the financial arrangement is stated. If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child for free meals.

6. Q: What if a child is selected for verification, but then transfers out of the school district before the information can be verified?

A: Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or a letter of adverse action has been sent. If a child is selected for verification but transfers out of the district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application **MUST** be selected.

If the child returns to the district, the LEA can proceed with verification and require the household to submit verification documentation prior to receiving meal benefits.

7. Q: How is overtime income counted for the purposes of verification?

A: The school official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income (without overtime).

8. Q: Am I verifying the household's eligibility at the time of application or its current eligibility?

A: Households that are selected for verification can submit income documentation from any point in time one month before the application was certified through the time the household is required to turn in their income documentation for verification. Households, which dispute the validity of income information acquired through systems of records, **MUST** be given the opportunity to produce more recent income information.

9. Q: **If a LEA chooses to do three percent verification, MUST an LEA select its sample of applications from each school in the LEA or is the sample selected from the LEA as a whole?**

A: LEAs are required to select and verify a sample of their approved free and reduced-price applications. The LEA as a whole **MUST** meet the three percent sample. It does not mean that each school has to do three percent. The sample may be selected from one or more schools, or from the LEA as a whole, *provided that* the verification efforts are applied without regard to race, sex, color, national origin, age or disability. Also, any selection method **MUST** ensure that all applications are subject to being sampled; i.e., if the LEA has decided to select the three percent verification sample from only one school in the LEA, all applications in that one school **MUST** have an equal chance of being selected.

10. Q: If my sample size is 4.02 applications, do I verify four or five?

A: Partial numbers **MUST** be rounded up to the NEXT whole number; five applications must be verified.

11. Q: Do we have to maintain the actual documentation from verification, or just the results of verification?

A: LEAs are required to maintain three things: a description of their verification efforts, documentation of the verification and the results of the verification. The description **must** summarize the selection process and techniques, the total number of applications on file as of **October 1**, and the percentage or number of applications verified.

The applications selected must be readily retrievable by school, and the LEA must document correspondence between the selected households and the LEA or school. If the application is verified by documents submitted by the household, the LEA must either retain the documents or a photocopy; or, if that is not possible, the relevant information can be copied from the document. If the LEA chooses to copy the information, enough of a record must be retained from the document to verify eligibility, including the type of document, e.g., ATP card or pay stub, time period of eligibility or income, income shown on the document and the date of the document. If other sources are used to document eligibility, such as the FDPIR office or collateral contacts, records of those sources and the information received must be documented as well.

The LEA must also keep a record of any change in eligibility as a result of verification procedures, the reason for the change, and the date the change was made.

12. Q: **When the notice of adverse action has been sent to a household, can I claim reimbursement for that child during the period covered by the advance notice?**

A: Yes. The household must be given 10-calendar days advance notice that a change is being made in the child's eligibility status. During that time, the child must continue to receive free or reduced-price meal benefits and the LEA may continue to claim reimbursement for free or reduced-price meals served to the child during this period.

13. Q: What if I use other agency records and the agency does not provide a response before March 1st?

A: Any extensions to the Verification Report March 1st deadline **MUST** be approved in writing by the FNS. If the LEA contacted another agency well in advance of the Verification Report March 1st deadline, it has demonstrated good faith and would likely be given an extension. The LEA must still track those students terminated as a result of verification, but who were reinstated as of February 15th.

14. Q: If a household is paid weekly and submits a pay stub for a week, MUST I go back and ask for pay stubs for a whole month?
- A: No. If the weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient.
15. Q: Can the determining official make an eligibility determination based upon other income sources that were not declared on the application but were known by the official?
- A: No. The determining official MUST make the initial determination based upon the face value of the application. However, immediately after the application is approved, the LEA may begin the verification process on that application.
16. Q: What if the determining official suspects that there are other sources of income?
- A: Any application that contains questionable information MUST be verified as soon as possible.
17. Q: What are my responsibilities between November 15th and February 15th?
- A: The LEA must track those students terminated as a result of verification, but who were reinstated as of February 15th.
18. Q: How and when do I submit my final verification report to ADE?
- A: The verification report can be reached through ADE's COMMON LOGON. The report must be complete and submitted by March 1st.
19. Q: Does a certified mail receipt with the recipient's signature qualify as a response to verification?
- A: No. A response to verification is considered actual income or eligibility documentation received from the household. Collateral contacts and agency records can also be used as a response to verification.
20. Q: What do you do if a child is initially certified for free, but during a confirmation review his or her eligibility is determined to be reduced?
- A: If the Confirmation Review leads to a decrease in benefits for the household, the LEA should proceed with verification before any notice of a change in eligibility status is given. These procedures are designed to avoid a possible unnecessary reduction in benefits.

21. Q: Would each program (Food Stamps, Cash Assistance, FDPIR) be considered as one contact for the purposed of direct verification, or would each program count as a separate contact?
- A: USDA (FNS) considers each program as a separate source to verify the household's eligibility status.
22. Q: If a case number application with three students, each of whom have their own Food Stamp case number, is selected for Verification and Directly Verified, do all the students need to come up as a "match"?
- A: No. Only one student on a case number application needs to have a result of "match" for the entire application to be verified.
23. Q: If none of the students on a case number application come up as a "match", what is the next step?
- A: If no students match, then the LEA must send out a "Notification of Verification" and attempt to obtain income and household size for the household. This would be completed in one of three ways; working with the household over the phone and properly document the conversation, having the adult household member come into the office and complete the rest of their current application, or having the household submit a new application along with their verification documentation. Once the income and household size for the household was obtained, the LEA must still confirm the information with written evidence.